AMERICAN PREVENTIVE MEDICAL ASSOCIATION

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May 17, 1999

By Facsimile and Mail

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Michael A. Friedman, M.D.

Lead Deputy Commissioner (HF-1)

U.S. Food and Drug Administration

5600 Fishers Lane

Rockville, Maryland 20857

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Dear Dr. Friedman:

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EXECUTIVE DIRECTOR Candace Campbell

On behalf of the American Preventive Medical Association, I would like to join People for Pure Foods in requesting the Commissioner of the U.S. Food and Drug Administration to stay the effective date of the proposed revisions to labeling requirements for foods treated with ionizing radiation.

As you know, the agency published an Advanced Notice of Proposed Rulemaking, Irradiation in the Production, Processing and Handling of Food, Docket No. 98N01038, in the Federal Register, Vol 64, No. 31, pp 7834-7838, February 17, 1999, and requested that written comments be submitted by May 18, 1999. People For Pure Foods' petition requested that the comment period be extended until September 15, 1999. Because of the concern and confusion over the issue of irradiation, we believe that it would be beneficial for the public and health care practitioners to have more time to more fully understand the impact of the proposed regulations, and to respond to the proposal. The subject of food irradiation has generated considerable fear among consumers and practitioners alike, and we believe that it would be in the best interests of all concerned, including the agency, to allow more time for education, discussion and response on this matter.

The American Preventive Medical Association is a nonprofit advocacy organization dedicated to creating a health care environment in which practitioners can practice in good conscience, with the well being of the patient foremost in their minds, and without fear of censure or recrimination for the use of complementary and alternative therapies. We have members in 47 states and 7 foreign countries. In addition, we co-chair a coalition representing over 300,000 practitioners in the United States.

Sincerely,

Candace Campbell Executive Director

Candace Campbell

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Michael A. Friedman, M.D. Lead Deputy Commissioner (HF-1) U.S. Food and Drug Administration 5600 Fishers Lane

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